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January 2, 2025

**VIA ECF**

Honorable Cheryl L. Pollak  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Renata Kociubinski et al v. NYC Health and Hospital Corp.,  
22 Civ. 2865 (ENV)(CLP)

Dear Judge Pollak:

I am the Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, assigned to represent defendant New York City Health and Hospitals Corporation (“H+H”) in the above-referenced case. In accordance with the November 1, 2024 Order, the parties submit this joint letter to provide the Court an update of the status of this case.

As of November 20, 2024, the parties have completed the in-person depositions of the non-party witnesses noticed for deposition. Specifically, the following individuals have been deposed: 1) Toni Louis, 2) Patricia Copes, 3) Darren Collington, 4) Leonid Mirakov, and 5) Elena Auxtin. Counsel for both Plaintiff and Defendants have conferred and confirm that all depositions have been completed and that discovery in this matter has been completed.

Respectfully submitted,  
/s/  
Sabrina T. Smith  
Assistant Corporation Counsel

cc: Jason Mizrahi, Attorney for Plaintiff